



September 5, 2008

Ms. Florence Harmon  
Acting Secretary  
Securities and Exchange Commission  
100 F Street NE  
Washington DC 20549

Dear Ms. Harmon:

**Re: File Number S7-15-08 – Modernization of the Oil and Gas Reporting Requirements**

The Canadian Association of Petroleum Producers (CAPP) appreciates the significant efforts of the Commission and its staff to undertake the modernization of the reporting requirements for oil and natural gas. CAPP represents 130 companies that explore for, develop and produce natural gas, natural gas liquids, and crude oil throughout Canada. CAPP member companies produce more than 95 per cent of Canada's natural gas and crude oil. Canada is the largest exporter of crude oil to the United States accounting for 20% of US crude oil imports and many of our members are listed in the United States and are subject to these reporting requirements.

CAPP commends the Securities and Exchange Commission's ("the Commission's") intent to provide investors with a more meaningful and comprehensive understanding of oil and gas reserves, which should help investors evaluate the value of oil and gas companies. We believe that the proposed changes and additions will achieve this outcome. This issue is of importance to Canadian companies reporting under these disclosure rules.

In general, CAPP concurs with the proposed changes. In addition, the following sections of this submission addresses several of the "requests for comment" outlined by the Commission in its proposal that provides CAPP's perspective. CAPP's key comments are summarized as follows:

- Prices used for determining reserves quantities should be the 12-month average price
- Prices used for accounting and disclosure purposes should be the same 12-month average price
- Oil and gas producing activities should include bitumen extracted from oil sands and oil and gas extracted from coal beds and shales
- Conventional and continuous accumulations should not be reported separately
- The proposed table of reporting PUD development should not be required

CAPP supports the Commission seeking public input on the proposed changes and additions as part of the process and recommends the points, noted in the attached Appendix, be considered in finalizing the new requirements and in moving into implementation.

Regards,

Martyn Griggs  
Manager, Oil Sands

2100, 350 – 7<sup>th</sup> Ave. S.W.  
Calgary, Alberta  
Canada T2P 3N9  
Tel (403) 267-1100  
Fax (403) 261-4622

403, 235 Water Street  
St. John's, Newfoundland  
Canada A1C 1B6  
Tel (709) 724-4200  
Fax (709) 724-4225

Email: [communication@capp.ca](mailto:communication@capp.ca) Website: [www.capp.ca](http://www.capp.ca)

















